

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

FREEDOM FROM RELIGION)
FOUNDATION, INC., ANNE NICOL)
GAYLOR, ANNIE LAURIE GAYLOR,)
PAUL GAYLOR, DAN BARKER,)
PHYLLIS ROSE, and JILL DEAN,)
)
Plaintiffs,)
) Case No. 08-CV-588
v.)
)
PRESIDENT BARACK OBAMA,)
WHITE HOUSE PRESS SECRETARY)
ROBERT GIBBS, WISCONSIN)
GOVERNOR JIM DOYLE, and SHIRLEY)
DOBSON, CHAIRMAN OF THE)
NATIONAL DAY OF PRAYER TASK)
FORCE,)
)
Defendants.)

)

DEFENDANT SHIRLEY DOBSON'S ANSWER

Defendant Shirley Dobson answers the First Amended Complaint as follows:

1. Paragraph 1 summarizes Plaintiffs' allegations and prayer for relief and thus no response is needed. Otherwise, denied.
2. Admit.
3. Admit.
4. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.
5. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

6. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

7. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

8. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

9. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

10. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

11. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

12. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

13. Admit.

14. This paragraph is a summary of the relief Plaintiffs are seeking, and thus no response is necessary. Otherwise, denied.

15. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

16. This paragraph is a summary of the relief Plaintiffs are seeking, and thus no response is necessary. Otherwise, denied.

17. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

18. This paragraph is a summary of the relief Plaintiffs are seeking, and thus no response is necessary. Otherwise, denied.

19. Defendant admits that she is the Chairman of the National Day of Prayer Task Force (“Task Force”). Otherwise, denied.

20. This paragraph is a legal conclusion to which no response is necessary.

21. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

22. Denied.

23. Denied.

24. Denied.

25. Denied.

26. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

27. Denied.

28. This paragraph is a summary of a document, which speaks for itself, and no response is necessary. Otherwise, denied.

29. This paragraph is a summary of a document, which speaks for itself, and no response is necessary.

30. Denied.

31. Denied.

32. Denied.

33. Denied.

34. Denied.

35. Denied.
36. Denied.
37. Denied.
38. Denied.
39. Denied.
40. Denied.
41. Denied.
42. Defendant admits that the Task Force rents space from Focus on the Family.

Otherwise, denied.

43. Denied.
44. Denied.
45. Denied.
46. Denied.
47. Denied.
48. Denied.
49. Denied.
50. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

51. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

52. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

53. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

54. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

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56. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

57. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

58. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

59. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

60. Denied.

61. Denied.

62. Denied.

63. Denied.

64. Denied.

65. This paragraph is a summary of a document, which speaks for itself, and no response is necessary.

66. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

67. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

68. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

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79. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

80. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

81. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

82. Denied.

83. Denied.

84. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

85. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

86. Denied.

87. Denied.

88. Denied.

89. Denied.

90. Denied.

91. Denied.

92. Denied.

93. Denied.

94. Denied.

95. Denied.

96. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

97. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

98. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

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100. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

101. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

102. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

103. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

104. No response is necessary to the legal conclusions contained in this paragraph.

Otherwise, denied.

105. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

106. No response is necessary to the legal conclusions contained in this paragraph.

Otherwise, denied.

107. No response is necessary to the legal conclusions contained in this paragraph.

Otherwise, denied.

108. No response is necessary to the legal conclusions contained in this paragraph.

Otherwise, denied.

109. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

110. No response is necessary to the legal conclusions contained in this paragraph.

Otherwise, denied.

111. No response is necessary to the legal conclusions contained in this paragraph.

Otherwise, denied.

112. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

113. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

114. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

115. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

116. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

117. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

118. Denied.

119. Denied.

120. Denied.

121. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

122. Denied.

123. Denied.

124. Denied.

125. Denied.

126. Denied.

127. Denied.

128. Denied.

129. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

130. Denied.

131. Denied.

132. Denied.

133. Denied.

AFFIRMATIVE DEFENSES

1. Plaintiffs have failed to state a claim for which relief can be granted.
2. Plaintiffs have failed to present a case or controversy.
3. Plaintiffs lack standing.
4. The relief Plaintiffs seek would unconstitutionally interfere with Defendant Dobson's First Amendment rights.

5. The relief Plaintiffs seek would violate the Establishment Clause.
6. The relief Plaintiffs seek would violate Defendant Dobson's Due Process and Equal Protection rights.
7. The relief Plaintiffs seek would violate the separation of powers doctrine.

Dated: June 9, 2009

Respectfully submitted,

Alan E. Sears, Esq
Benjamin W. Bull, Esq.
ALLIANCE DEFENSE FUND
15100 N. 90th Street
Scottsdale, Arizona
Tel: 480-444-0020
Fx: 480-444-0025
joster@telladf.org

/s/Joel Oster
Joel Oster, KS Bar 18547
Kevin Theriot, KS Bar 21565
ALLIANCE DEFENSE FUND
15192 Rosewood
Leawood, KS 66224
Tel: (913) 685-8000
Fax: (913) 685-8001

COUNSEL FOR DEFENDANT SHIRLEY DOBSON

CERTIFICATE OF SERVICE

I hereby certify that on June 9, 2009, I electronically filed a copy of the above using the ECF System for the Western District of Wisconsin, which will send notification of that filing to all counsel in this litigation who have entered an appearance, including counsel for plaintiffs.

/s/Joel Oster
Joel Oster